



DATE: August 19, 1996

TO: Paul Lanning, Planner IV, Planning

FROM: Manager, Environmental Resources

Subject: Revised - Review of Pease I environmental site assessment for Janes A.

MUSICE FACILITY, 13592 MUSICE DRIVE, IRVINE

Environmental Resources Division (ERD) has reviewed the subject document for conformance with industry practices for conducting Hazardous Materials Assessments (HMAs). The purpose of this review is to determine the adequacy of the subject document for inclusion in the Environmental Impact Report (EIR) for the expansion of the James A. Musick Jail Facility and to evaluate its usefulness as guidance for the proposed expansion.

The subject document was prepared by Phase One, Inc., on July 11, 1996. The Assessment comprised: 1) a review of historic site-use activities, 2) regulatory database searches and records review, 3) a site reconnaissance, and 4) interviews. The Assessment did not include an inspection of on-site structures on the 100-acre property.

Phase One's conclusions found "two minor environmental concerns" and "two potential or possible environmental conditions." Also, with regard to on-site structures that were not inspected, the report stated that "given the pre-1981 construction date of some of the on-site buildings, it is likely that asbestos is present in and on these structures."

The "minor environmental concerns" were:

- 1) historical use of pesticides for agricultural use on 75 percent of the site area, and
- 2) various cases of the storage and usage of hazardous materials on the property, including: (1) an undocumented, abandoned underground storage tank previously filled with diesel fuel; (2) interviews revealing two previously leaking underground tanks that had been excavated and backfilled with cement; (3) a documented 10,000-gallon underground gasoline tank on-site, assumed to be one of the removed tanks; (4) six 55-gallon storage drums of oil and waste oil kept on an unpaved surface; (5) a small oil pump associated with oil storage on an unpaved surface; and (6) hazardous materials storage of various solvents within an uninspected warehouse.

The "potential or possible environmental conditions" were:

- 1) the potential for contamination from polychlorinated biphenyls (PCBs) originating from several on-site, pad-mounted transformers, and
- 2) the potential for on-site groundwater contamination originating from the ${\tt Sl}$ Toro Marine Corps Air Station.

With regard to these findings, Phase One's assessment recommends:

- that soil borings be taken to sample areas that have been, or are currently, used for agricultural purposes;
- 2) that the abandoned diesel tank be properly abandoned and documented and soil borings be taken to determine possible fuel leakage;
- 3) that pending documentation from the Orange County Health Care Agency be reviewed regarding the two underground tanks which were reportedly removed; if closure cannot be verified, soil borings are recommended;
- that the documented underground tank be positively identified as one of those removed or its current location and status found;
- 5) that all 55-gallon drums of hazardous materials or waste be provided secondary containment and soil borings be taken in the vicinity to determine the impact of spillage or leakage over time;
- 6) that soil sampling be conducted beneath the small, abandoned oil pump and storage tank to determine the impact of spillage or leakage over time;
- 7) that soil sampling be conducted in the vicinity of the solvent and waste solvent storage and usage areas to determine the impact of spillage or leakage over time.

The assessment concluded that both "potential or possible environmental conditions" were a low potential for impacting the property and that there is no indication of the presence of formaldehyde or heavy metals. In the absence of building inspections, no conclusions or recommendations were made regarding the potential presence or impact of radon, lead-based paint or lead-containing water.

ERD found the Phase One report to be extremely thorough and consistent with County standards for conducting such Hazardous Materials Assessments. Further, ERD concurs with all of the Phase One findings and recommendations and that the additional environmental investigations of the property are warranted.

It should be noted noted that due to the potential for environmental contamination identified in the Phase One report, the final building design and placement may need to be integrated with site mitigation measures if these are determined to be necessary.

With regard to the issue of asbestos, the County of Orange General Services Agency has conducted an asbestos survey of the Musick structures (attached). ERD recommends that this survey be added to the hazardous materials chapter of the EIR.

Musick Facility Environmental Assessment Review Page 3

If you have any questions, please contact Ward Allabach at 567-6376.

Chris Crompton

Attachments:

- Phase I Environmental Site Assessment, Completed by Phase One, Inc., Dated July 11, 1996
- Comprehensive Asbestos Survey for County of Orange James A. Musick Jail Facility, Completed by ATC Environmental, Inc., Dated April 1991

RWA: rwa